

# **EXHIBIT B**

E-FILED

IN COUNTY CLERK'S OFFICE  
PIERCE COUNTY, WASHINGTON

April 09 2021 10:12 AM

KEVIN STOCK  
COUNTY CLERK  
NO: 21-2-05430-9

1  
2  
3  
4  
5  
6

7 SUPERIOR COURT OF WASHINGTON FOR PIERCE COUNTY

8 BONNIE MARKWELL, )  
9 Plaintiff, ) No.  
10 vs. )  
11 WALMART INC., ) SUMMONS  
12 Defendant. )  
13

14 TO THE DEFENDANT:

15 A lawsuit has been started against you in the above-entitled Court by the above  
16 Plaintiff. Plaintiff's claim is stated in the written Complaint, a copy of which is served  
17 upon you with this Summons.

18 In order to defend against this lawsuit, you must respond to the Complaint by stating  
19 your defense in writing, and by serving a copy upon the person signing this Summons  
20 within twenty (20) days after the service of this Summons or sixty (60) days if you are  
21 served outside of the State of Washington, excluding the day of service, or a Default  
22 Judgment may be entered against you without notice. A Default Judgment is one where  
23 plaintiff is entitled to what it asks for because you have not responded. If you serve a  
24 Notice of Appearance on the undersigned person, you are entitled to notice before a Default  
25 Judgment may be entered.

26  
SUMMONS - 1

ANDERSON HUNTER LAW FIRM, P.S.

2707 COLBY AVENUE, SUITE 1001  
EVERETT, WASHINGTON 98201  
TELEPHONE (425) 252-5161  
FACSIMILE (425) 258-3345

You may demand that the plaintiff file this lawsuit with the Court. If you do so, the demand must be in writing and must be served upon the person signing this Summons. Within fourteen (14) days after you serve the demand, the plaintiff must file this lawsuit with the Court, or the service on you of this Summons and Complaint will be void.

If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your written response, if any, may be served on time.

This Summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State of Washington.

DATED this 8<sup>th</sup> day of April, 2021.

## ANDERSON HUNTER LAW FIRM, P.S.

By John Follis by Jeff Clark  
John A. Follis, WSBA #18513  
Attorneys for Plaintiff

— 1 —

ANDERSON HUNTER LAW FIRM, P.S.

2707 COLBY AVENUE, SUITE 1001  
EVERETT, WASHINGTON 98201  
TELEPHONE (425) 252-5161  
FACSIMILE (425) 258-3245

E-FILED  
IN COUNTY CLERK'S OFFICE  
PIERCE COUNTY, WASHINGTON

April 09 2021 10:12 AM

KEVIN STOCK  
COUNTY CLERK  
NO: 21-2-05430-9

1

2

3

4

5

6

7

SUPERIOR COURT OF WASHINGTON FOR PIERCE COUNTY

8

BONNIE MARKWELL,

Plaintiff,

)  
No.

9

10

vs.

COMPLAINT

11

WALMART INC.,

Defendant.

12

13

Plaintiff, by and through her counsel of record, alleges as follows:

14

1. Plaintiff Bonnie Markwell is a resident of Pierce County, Washington.

15

16

2. Upon information and belief, defendant Walmart Inc. is an American multinational retail corporation that operates a chain of hypermarkets, discount department stores, and grocery stores from the United States, headquartered in Bentonville, Arkansas. Walmart does business in Pierce County, Washington.

17

18

19

3. Plaintiff was shopping in the Bonnie Lake Walmart on January 14, 2021, in Pierce County, Washington.

20

21

4. This Court has jurisdiction over this cause and venue is proper.

22

23

24

25

5. When plaintiff existed the Walmart store she fell in a hole/depression in the

26

Walmart parking lot and was injured as a result. The hole/depression existed for enough time for Walmart to have been on notice of this potentially dangerous condition.

COMPLAINT - 1

ANDERSON HUNTER LAW FIRM, P.S.  
2707 COLBY AVENUE, SUITE 1001  
EVERETT, WASHINGTON 98201  
TELEPHONE (425) 252-5161  
FACSIMILE (425) 258-3345

JAF/21334-1/1105774

6. Plaintiff's injuries were caused by the negligence of Walmart in failing to properly maintain its parking facilities for customers and invitees.

7. As a result of plaintiff's fall in the Bonnie Lake Walmart parking lot, plaintiff fractured her femur and sustained serious injuries. Plaintiff has incurred medical expenses and other consequential damages because of her fall.

WHEREFORE, the plaintiff is requesting all relief allowed by law, plus such other relief as the Court deems just and equitable.

DATED this 8 day of April, 2021.

ANDERSON HUNTER LAW FIRM, P.S.

By John Follis by Jeffrey C. Weiskopf  
John A. Follis, WSB# 18513  
Attorneys for Plaintiff

**COMPLAINT - 2**

ANDERSON HUNTER LAW FIRM, P.S.

2707 COLBY AVENUE, SUITE 1001  
EVERETT, WASHINGTON 98201  
TELEPHONE (425) 252-5161  
FACSIMILE (425) 258-3345